Exhibit No.__(MPG-20) Docket Nos. UE-111048/UG-111049 Witness: Michael P. Gorman

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION,)))
Complainant,)
V.)
PUGET SOUND ENERGY, INC.,))
Respondent.)
)

Docket Nos. UE-111048/UG-111049 (consolidated)

EXHIBIT NO.___(MPG-20)

STANDARD & POOR'S CREDIT METRICS – 9.70% ROE

December 7, 2011

Standard & Poor's Credit Metrics

(9.70% Return on Equity)

		Retail Cost of Service		S&P Benchmark ^{1/2}				
Line	Description		ount (000)	Intermediate	Significant	Aggressive		Reference
	<u> </u>		(1)	(2)	(3)	(4)		(5)
1	Rate Base	\$	6,563,062				Exhibit Nos	_(MJS-7) and (JSH-7).
2	Weighted Common Return		4.46%				Page 2, Line 3	3, Col. 3.
3	Pre-Tax Rate of Return		10.55%				Page 2, Line 4	4, Col. 4.
4	Income to Common	\$	292,713				Line 1 x Line 2	2.
5	EBIT	\$	692,630				Line 1 x Line 3	3.
6	Depreciation & Amortization	\$	345,595				Exhibit Nos	_(MJS-3) and (JSH-3).
7	Imputed Amortization	\$	9,900				Page 4, Line §	9, Col 1.
8	Deferred Income Taxes & ITC	\$	(35,504)				Exhibit Nos	_(MJS-3) and (JSH-3).
9	Funds from Operations (FFO)	\$	612,703				Sum of Lines	4, and 6 to 8.
10	Imputed Interest Expense	\$	20,500				Page 4, Line 8	3, Col 1.
11	EBITDA	\$	1,068,625				Sum of Lines	5 through 7 and Line 10.
12	Total Debt Ratio		56%	35% - 45%	45% - 50%	50% - 60%	Page 3, Line 4	4, Col. 1.
13	Debt to EBITDA		3.5x	2.0x - 3.0x	3.0x - 4.0x	4.0x - 5.0x	(Line 1 x Line	12) / Line 11.
14	FFO to Total Debt		17%	30% - 45%	20% - 30%	12% - 20%	Line 9 / (Line	1 x Line 12).

Sources:

¹ Standard & Poor's: "Criteria Methodology: Business Risk/Financial Risk Matrix Expanded," May 27, 2009.

² S&P RatingsDirect: "U.S. Regulated Electric Utilities, Strongest to Weakest," October 4, 2011.

Note:

Based on the May 2009 S&P metrics, Puget Sound Energy Inc. has an "Excellent" business profile and an "Aggressive" financial profile.

Standard & Poor's Credit Metrics (Pre-Tax Rate of Return)

<u>Line</u>	Description	<u>Weight</u> (1)	<u>Cost</u> (2)	Cost (3)	<u>Cost</u> (4)
1 L	ong-Term Debt	50.00%	6.37%	3.19%	3.19%
2 5	Short-Term Debt	4.00%	4.62%	0.18%	0.18%
3 0	Common Equity	<u>46.00%</u>	9.70%	<u>4.46%</u>	<u>7.18%</u>
4 T	Fotal	100.00%		7.83%	10.55%

5 Tax Conversion Factor*

1.6106

Sources:

Exhibit No.___(MPG-3).

* Exhibit Nos.___(MJS-7) and (JSH-7).

Standard & Poor's Credit Metrics (Financial Capital Structure)

<u>Line</u>	Description	<u>Weight</u> (1)		
1	Long-Term Debt	47.58%		
2	Short-Term Debt	3.81%		
3	Off Balance Sheet Debt ¹	<u>4.85</u> %		
4	Total Long-Term Debt	56.23%		
5	Common Equity	<u>43.77</u> %		
6	Total	100.00%		

Sources: Page 2. ¹ Page 4, Line 7, Col. 1.

Standard & Poor's Credit Metrics (Off Balance Sheet Debt)

<u>Line</u>	Description	<u>Amount (000)</u> (1)	
	Total Company		
1	Operating Leases	\$	99,300
2	Imputed Interest Expense	\$	6,100
3	Imputed Amortization Expense	\$	6,500
4	Purchase Power Agreements	\$	234,900
5	Imputed Interest Expense	\$	14,400
6	Imputed Amortization Expense	\$	3,400
	Allocation		
7	Total Off Balance Sheet Debt	\$	334,200
8	Imputed Interest Expense	\$	20,500
9	Imputed Amortization Expense	\$	9,900

Source:

¹ Standard & Poor's RatingsDirect, "Puget Sound Energy Inc." February 24, 2011 at 6.